

EXHIBIT 12

From: [Silverstein, Chelsea](#)
To: [Jaime McDade](#); [thomas.collins@bipc.com](#); [Weil Walgreens Team](#); [Polkes, Jonathan](#); [Zalka, Caroline](#)
Cc: [David Knotts](#); [Esther Lee](#); [Randall Baron](#); [Lawrence Stengel](#)
Subject: RE: Chabot, et al. v. Walgreens Boots Alliance, Inc., et al., No. 18-cv-2118 - Plaintiffs' Second Set of Interrogatories
Date: Thursday, October 29, 2020 6:19:24 PM
Attachments: [WBA R&Os to Plaintiffs' Second Set of Interrogatories.pdf](#)
[S. Pessina R&Os to Plaintiffs' Second Set of Interrogatories.pdf](#)
[G. Fairweather R&Os to Plaintiffs' Second Set of Interrogatories.pdf](#)

Counsel,

Please see attached Responses & Objection to Plaintiffs' Second Set of Interrogatories that we are serving on behalf of Defendants Walgreens, Stefano Pessina, and George Fairweather.

As provided in the responses to Interrogatory No. 1, Defendants will use information received from counsel regarding the FTC review process, together with other evidence, to show that they honestly believed, and had a reasonable basis for, each of the statements they made that are alleged to be false or misleading in this case, and that each such statement fairly aligned with the information they possessed at that time. In recent correspondence, Plaintiffs have suggested that this information is somehow "incriminating" and was wrongfully suppressed in the previous stage of discovery. Those contentions could not be more wrong. Far from being "incriminating" or any of the other labels Plaintiffs have used in recent correspondence, communications from the lawyers (among other evidence) proves the reasonable basis underlying the statements made by Messrs. Pessina and Fairweather and demonstrates their genuine belief in the accuracy of those statements.

Regards,

Chelsea

Weil

Chelsea Silverstein

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From: Jaime McDade <JaimeM@rgrdlaw.com>
Sent: Tuesday, September 29, 2020 5:34 PM
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Please find the attached Second Set of Interrogatories to Defendants Walgreens Boots Alliance Inc., George R. Fairweather and Stefano Pessina.

Jaime A. McDade
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